

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CARPENTERS FRINGE BENEFIT)	
FUNDS OF ILLINOIS, <i>et al.</i> ,)	
)	CIVIL ACTION
Plaintiffs,)	
)	NO. 17 C 6523
vs.)	
)	JUDGE ANDREA R. WOOD
ALCA, INC., an Illinois corporation,)	
)	
Defendant.)	

**MOTION FOR ENTRY OF DEFAULT AND JUDGMENT AND FOR AN
ORDER DIRECTING DEFENDANT TO TURN OVER ITS MONTHLY
FRINGE BENEFIT CONTRIBUTION REPORT**

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, ALCA, INC., an Illinois corporation, in the total amount of \$8,697.66, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$1,137.50.

Further, Plaintiffs move for entry of an order directing ALCA, INC., an Illinois corporation, Defendant herein, to turn over its monthly fringe benefit contribution report due for the month of September 2017, pursuant to the Agreements and Declarations of Trust to which Defendant is bound, said Defendant having failed to answer or otherwise plead to the Complaint and the monthly contribution report being required in order to fully liquidate Plaintiffs' claims.

On September 14, 2017, the Summons and Complaint was served on the Registered Agent (by tendering a copy of said documents to Lisle Neimann, Clerk) at its place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due

on October 5, 2017. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Cecilia M. Scanlon

Cecilia M. Scanlon
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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 2nd day of November 2017:

Illinois Corporation Service Corp.,
Registered Agent for Alca, Inc.
801 Adlai Stevenson Drive
Springfield, IL 62703

Mr. David C. Pasquinelli, President
Alca, Inc.
161 Tower Drive, Unit F
Burr Ridge, IL 60527-5776

/s/ Cecilia M. Scanlon _____

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